

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
KEVIN MERCHANT, )  
Plaintiff )  
 )  
v. )  
 )  
EQUIFAX, INFORMATION )  
SERVICES, LLC, )  
Defendant )  
\_\_\_\_\_ )

C.A.No.: 20CV11136TSH

**AFFIDAVIT OF ADAM DEUTSCH**

I, Adam Deutsch, having been duly sworn, do hereby depose and make affidavit as follows:

- (1). I am a member of the Bar of Massachusetts, and make this Declaration in support of Plaintiff's Motion for Attorney's Fees and Costs.
- (2). I was admitted to practice law in 2010, and have been submitted to SuperLawyers Rising Stars, every year since 2017.
- (3). I am the founder of Northwest Law Group, LLC, located in Longmeadow, MA, where we focus the majority of our practice in the area of protecting consumer rights in Massachusetts and New Jersey.
- (4). Since 2010, I have represented in excess of 400 consumers in the exercise of their rights under both federal and state consumer protection laws.
- (5). In 2018, I hosted a consumer protection seminar in Springfield, MA, providing consumers with information on how to deal with erroneous credit reporting, aggressive debt collectors, and other common issues.
- (6). I have personal knowledge and experience regarding the standard hourly rate charged by consumer protection attorneys in the State of Massachusetts, having practiced law for more than a decade.
- (7). I have reviewed the Declaration of Jonas Jacobson, and his invoice for the work performed in this matter.
- (8). Given the prevailing market rates, my review of Mr. Jacobson's Declaration, and based on the fact that Mr. Jacobson has regular hourly clients who pay the rate sought in his Fee Application, Mr. Jacobson's proposed hourly rate of \$450/hour is reasonable for a consumer protection attorney with over 12 years of experience, practicing in the Boston, Massachusetts area. In fact, \$450/hour is slightly lower than might be expected by a consumer protection attorney with comparable experience.

(9) Having reviewed Mr. Jacobson's time records for the case, I believe he worked more efficiently than the average attorney and as a result has presented a lower fee than I would have expected for a Fair Credit Reporting Act case that went through the Summary Judgment stage or proceedings.

(10). I am not related to any of the parties in this action.

(11). I have no financial interest in this case.

(12). I am receiving no compensation for submitting this affidavit.

Signed under the Pains and Penalties of Perjury, this 7 day of September, 2022,

A handwritten signature in black ink, appearing to read "Adam Deutsch", written over a horizontal line.

Adam Deutsch (BBO: 569173)